

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

CAO/SSS F. # 2011R01982

271 Cadman Plaza East Brooklyn, New York 11201

March 12, 2014

## By ECF

Joel Stein Esq. 30 Wall St 8th floor New York, New York 10005

Re: United States v. Sandy Winick, et al.,

Criminal Docket No. 13-452 (S-1)(WFK)

## Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and your March 6, 2014 executed protective stipulation, the government hereby furnishes the following 2 discs of additional discovery with respect to the above-referenced matter. This submission supplements the government's earlier disclosures. The government also renews its request for reciprocal discovery from the defendants.

At the lobby of our building, you may request copies of two discs, containing:

	Discovery 4	WIN-ADV-FEE-CON 000001	Disc 1: Consensual Wiretaps (917-562-7679)
-		WIN-ADV-FEE-CON 000002	Disc 2: Consensual Wiretaps (917-562-7679) and Linesheets (917-562-7679)

Only counsel of record or someone from counsel's office will be permitted to obtain the discs. Consistent with the government's earlier communications, other defendants will only gain access to these materials at this time if they execute the protective stipulation.

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: <u>/s/</u>

Christopher Ott Sylvia Shweder Assistant U.S. Attorneys (718) 254-6154/6092

cc: Clerk of the Court (WFK) (by ECF)